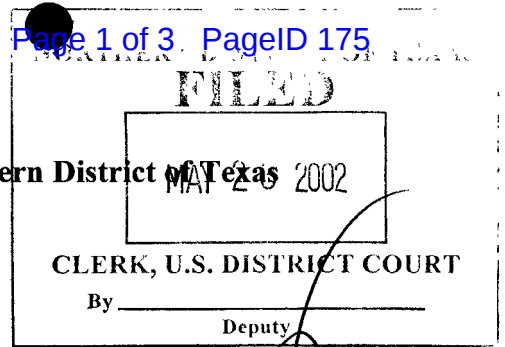


ORIGINAL

In the United States District Court for the Northern District of Texas
Dallas Division



(USA and)
Jamal Elhaj-Cehade
Co- plaintiff

Vs.
Educational Commission for Foreign Medical Graduates
Et al entities and individuals) Defendants

3:01-CV-01301-L

**Plaintiff's motion for an emergency(injunctive) relief and
compliance
May 23, 2002**

Comes now on this date, May 23, 2002, The plaintiff is filing his motion for an emergency relief and compliance by the defendants as Follow:

FACTS

- 1- The defendants ECFMG et al **admitted** to the US Government in their income tax filings(year 1999) that the ECFMG was created **to owe** the plaintiff a permanent life term duty, obligations, and role to identify, assess, accommodate, and meet the **plaintiff's NEEDS**.: Duty toward the plaintiff to **MEET HIS NEEDS**.- (contract, purpose of existence, etc...).
- 2- The defendants ECFMG concomitantly also **admitted**(to the US Government) to the linkage between their Benefits/exempt status under 501-C-3, and their **duty to MEET the Plaintiff's NEEDS** – duty to both the US Government and the plaintiff.
- 3- the plaintiff repeatedly demanded that the defendants urgently identify, assess, accommodate and meet the **plaintiff's NEEDS** but the defendants maliciously ignored the matter and refuse to do so. Therefore the defendants did/do **NOT** meet the **plaintiff's NEEDS** and the evidences are clear beyond any doubt or alternatives
- 4- This case is a civil case and the evidences are self explanatory against the defendants(preponderance of evidences, and FRCP rules of evidence that courts **MUST ALWAYS** look into evidence as **MOST** favorable to the plaintiff side)
- 5- the plaintiff's Legal NEEDS as a pro-se must be met before any judgment and if the defendants refuse to adequately meet those NEEDS, then the court must **INEVITABLY** render judgment in favor of the plaintiff and this should serve as a motion(if needed) to do so.
- 6- the plaintiff is entitled for an emergency relief from the **Ongoing violations** and practices of the defendants as a *Matter of Laws*, and/or a *Matter of Rights*, and/or

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as a *Matter of Process*(the defendants and the court MUST MEET THE PLAINTIFF'S NEEDS).

Argument

1-The defendants refusal, to identify, and assess, accommodate and meet the **plaintiff needs**, constitutes extreme evidence against the defendants of the charges brought against the ECFMG **ONGOING** practices: a- ECFMG unjust enrichment at the expenses of the plaintiff's NEEDS; b-the breech of contract at the expenses of the plaintiff's needs; c-deceptive trade practices that resulted in the fact that the plaintiff's NEEDS are not met; d- retaliation against the plaintiff by refusing to recognize the fact that the plaintiff does have needs to be met; e- fraud and deceit and false pretenses and the alternative against the plaintiff; d- continuous subjecting the plaintiff to the violations of his constitutional rights ; f- Subjecting the plaintiff to the double jeopardy, discrimination, profiling g- subjecting the plaintiff to various deprivations of rights and properties and extortion and aggravations ; h- The theft of the plaintiff's opportunities and advancement and prosperities and benefits by exparte communication, price fixing, or by misuse of the benefits the ECFMG acquired under 501-C-3 at the expense of the plaintiff's NEEDS(see above FACTS paragraph 2 regarding the LINKAGE between the defendants 501-C-3 Status and the ECFMG duty to meet the plaintiff's NEEDS); and the list is endless...

2- in addition to the above violations, the defendants engaged into fraud and abuse against the US Government by abusing the claim and benefits under 501-C-3; simply the defendants status of 501-C-3 is **LINKED** (linkage) to the defendants MEETING the plaintiff's NEEDS. **The court does not need more proof that the plaintiff's NEEDS are not met.** Therefore the defendants claim of 501-C-3 was entered into fraud and conspiracy just for the sole purpose of acquisition of benefits and to further use those power and benefit to further violate other Us laws. Moreover the defendants engage into more fraud against the US Government not only by failing to maintain **the linkage** with the meeting of the plaintiff's NEEDS. But also the defendants have channeled money and further engaged in tax fraud by either *not disclosing* all the income generated(in order to maintain certain benefit subcategory of 501-C-3) or by falsely claiming deductions for expenses **that were never made**(beginning 1994, the defendants ECFMG does not issue Examination refunds. The defendants admitted to such policy in their book/directory 1997 booklet pages 2 question#1, and on bottom page 17. however the defendants claimed such refunds as expenses in every tax filed). While the tax matter is a government matter. The existence of the **linkage** between the 501-C-3 benefit and the plaintiff NEEDS to be met, creates yet an additional **standing** for the plaintiff in any activities the defendants are engaging in. BECAUSE the funds that are missing or channeled or misused were SUPPOSED to be used to **MEET the plaintiff's NEEDS**. Simply the plaintiff's NEEDS are not met and so the defendants claims of 501-C-3 must be revoked until the defendants comply. The plaintiff does have Standing because of his NEEDS and the plaintiff is pursuing what is his. The plaintiff is willing to assist the government to claims what is his. And

should the government refuses, the plaintiff still does have claims because of the plaintiff's NEEDS.

Demands

The defendants made their language clear in that they are **NOT** willing to MEET the plaintiff NEEDS; the plaintiff is hereby asking the court to render judgment into his favor against the defendants ECFMG. The plaintiff is entitled for relief from the ongoing practices by the defendants **NOW and before july2002**; the Plaintiff's relief is a matter of laws, rights or process. There is continuous obligation by the defendant to meet the plaintiff's NEEDS(plaintiff's claim and right and continuous contract), the defendants also are into a vicious circle because any set back for the plaintiff will create more Plaintiff's NEEDS that must be met ultimately by the defendants and therefore the court does have a duty to render judgment in favor of the plaintiff and MEET the plaintiff's NEEDS. the plaintiff's NEEDS can be met only if the defendants fulfill their duty or if the court renders judgment in favor of the plaintiff asking them to do so.

Furthermore, the court does not have a choice but to render a judgment in favor of the plaintiff. **It is the sole way to meet the plaintiff's NEEDS.** Any other alternative constitute a new failure of assessment of the plaintiff NEEDS and create NEW NEEDS that ultimately needs to be met by the defendants. Therefore, the plaintiff is moving this case for an emergency hearing for an emergency relief so that the plaintiff can lead a life like the attorneys and the judges the hearing must be done in the presence of all the parties and before judge in which each side will have the opportunity to dispute and state his side and in which the defendants nature will be exposed as to leave no room for doubt that *judgment* must be **INEVITABLY** into the **plaintiff 's favor and MEET his NEEDS.** In addition that plaintiff reaffirms his previous requests to have his legal NEEDS and hearing in his presence before judges before any order or judgment that does not meet the plaintiff's NEEDS. The defendants attorney admitted Arrogantly on April 11, 2002 at 1:03 PM to the long existing exparte communication between his clients and the court. And that any order rendered against the plaintiff is considered as void done under the influence.

Certificate of service: this is to certify that a true copy of the foregoing has been sent to the defendant attorney on May23, 2002 via e-mail and via USPS regular mail paid on same day to the defendants attorney Mrs. Susan Schwartz/ Mark Robert at 6688 N Central Expway # 850 Dallas Texas 75206-3913 on the day of May 23, 2002

Attached is a letter of urgency for fast forwarding and order

Respectfully submitted to the Honorable Judges Sam Lindsey and MG Paul Stickney

Plaintiff Dr Jamal Elhaj-Chehade, pro-se(at this time) and IFP
5414 Cedar Springs# 806 Dallas, Texas 75235.

Plaintiff's e mail **heyjam7@yahoo.com**